

## 4.G Cumulative Impacts

The comments and corresponding response in this section relate to the cumulative analysis in the draft SEIR:

- Comment CU-1: Cumulative Analysis

### *Comment CU-1: Cumulative Analysis*

This response addresses comments from the commenter listed below; each comment on this topic is quoted in full below this list:

O-WPA1-3  
O-WPA3-7  
I-BARISH3-22  
I-BARISH3-23  
I-BELBIN-3  
I-GOODMAN-2

“Next, the DSEIR fails to mention that City College has an agreement and will undertake to have 500 units of student housing developed on what’s called the East Basin. That is not taken into consideration.

In addition, the consideration of the building of the PAEC, and the STEAM building, is going to go on simultaneously and the DSEIR does not take into consideration the tremendous environmental problems caused by a simultaneous construction on the East Basin and the West Basin, which will result in virtually no parking remaining.”

*(Michael Ahrens, President, Westwood Park Association, CPC Hearing, September 12, 2019 [O-WPA1-3])*

### “CCSF Student Housing Project

The DSEIR fails to mention in the cumulative analysis that CCSF will proceed with the construction of 500 units of student housing on the campus which was discussed at a Balboa Reservoir CAC meeting on June 10, 2019. Such a project would only exacerbate the lack of adequate parking, as well as creating additional secondary impacts on transportation, air quality and noise. The related impacts from this foreseeable Project should be included in the cumulative impact analysis.”

*(Michael Ahrens, President, Westwood Park Association, Letter, September 22, 2019 [O-WPA3-7])*

“Further, *Antioch v. Pittsburg* (1986) 187 Cal. App. 3d 1325 ([http://resources.ca.gov/ceqa/cases/1986/antioch\\_121686.html](http://resources.ca.gov/ceqa/cases/1986/antioch_121686.html)) Stands for the proposition that an EIR must consider cumulative impacts on

future projects. CCSF is planning to do additional construction on the upper parking lot adjacent to the Project, namely a Performing Arts Education Center and a STEAM building. But the DSEIR failed to consider the impact of the Project on this future construction. The FSEIR must review and evaluate this impact.

Further, California Code of Regulations, Title 14, 15125 (c) states: *Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.*

City College is a unique educational institution that provides services for tens of thousands of students daily, and employment for many more thousands. It is the only Community College in San Francisco, with a long and storied history of serving the entire City of San Francisco. There is no question that the Project will impact City College. The DSEIR is inadequate since it fails to comprehensively consider the environmental impacts of the Project on City College. The FSEIR must rigorously review all the substantial environmental impacts on City College in accordance with CEQA. Failure to do so would result in a flawed and inadequate FSEIR."

(Jean Barish, Letter, September 20, 2019 [I-Barish-22])

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"Approach to Cumulative Impact Analysis (p. 3.A-8) The DSEIR states: *At the time of this DSEIR preparation, the project description detail for the facilities master plan projects for the Ocean Campus is limited, City College may change those projects or their details depending on funding availability, and City College has not conducted CEQA analysis for those projects. Therefore, the cumulative analysis for this SEIR will qualitatively assess the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the "City College Facilities Master Plan" using best available information at the time of this SEIR preparation.* (p. 3.A-14)

An analysis based on "best available information" is inadequate. CEQA reviews should not be based on speculation, but on quantifiable, objective data. The fact that the City College FMP is ambiguous and uncertain at this time raises serious questions about the validity of any conclusions about Cumulative Impact Analyses."

(Jean Barish, Letter, September 20, 2019 [I-BARISH3-23])

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"Planning documents presented to date make inadequate evaluation of cumulative impacts and fail to account for past, present and reasonably foreseeable projects by completely ignoring the PAEC!"

(Charles Belbin, Email, September 22, 2019 [I-BELBIN-3])

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"I had attended many of the Reservoir project meetings providing comment and concerns on the proposals. Also indicating the joint/dual nature of the Balboa Reservoir and CCSF planning efforts and that they should not be looked at independently, but jointly as cumulative impacts on an area.

This is very similar to the growth impacts of SFSU-CSU and Parkmerced and Stonestown. The growth and impacts of institutions in the areas and the flow of traffic along ocean ave is directly impacted by the ongoing developments and the increased traffic which will occur with this development. The City College masterplan is underway but does not indicate the fact that they have considerable land to redevelop, and this includes the eastern edge of their property which abuts the freeway and can easily be transformed vertically into parking with buildings above using a layering concept to allow joint use of the parking for the CCSF and other adjacent parking needs for BART, LWHS, and even the Balboa Park, and Police station across the freeway."

*(Aaron Goodman, Letter, September 12, 2019 [I-GOODMAN-2])*

### **Response CU-1: Cumulative Analysis**

Comments state that the draft SEIR cumulative analysis is inadequate because it is not based on quantifiable data, and does not analyze the proposed project's cumulative impacts on City College. The comments also state that the cumulative analysis does not take into consideration other potential City College projects such as student housing, the City College Performing Arts Education Center, and the STEAM building.

The cumulative impact analysis in the draft SEIR is consistent with CEQA. Cumulative impacts, as defined in CEQA Guidelines section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other closely related past, present, or reasonably foreseeable future projects.

Two approaches to an adequate discussion of cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts; or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The projections model includes individual projects and applies a quantitative growth factor to account for other growth that may occur in the area. The analyses in the SEIR employ both the list-based approach and a projections-based approach, depending on which approach best suits the individual resource topic being analyzed. The cumulative impact analysis in the draft SEIR is consistent with CEQA Guidelines section 15130.

Based on review of the June 10, 2019, meeting audio recording of City College's update<sup>1</sup> and draft meeting notes,<sup>2</sup> the concept of additional housing on the east basin has been discussed at previous board meetings, but further action has not been taken to study the potential east basin housing (such as in the facilities master plan or environmental review), or to undertake or implement this project; thus this concept of additional housing is speculative and not reasonably foreseeable in the cumulative analysis. Even if this proposal were reasonably foreseeable, the cumulative impacts from this proposal would likely be covered by the draft SEIR cumulative analysis, as explained below.

**Commented [PJ(1)]:** Should there be a separate footnote for this?

Potential cumulative impacts of the facilities master plan projects construction on the east basin are considered in the draft SEIR. Section 3.A.6, Approach to Cumulative Impact Analysis on draft SEIR pp. 3.A-10 and 3.A-14, describes the recommendations for the Ocean Campus in the facilities master plan, as well as projects that could be funded by a bond measure, which passed on March 3, 2020. Because of the differences between the facilities master plan and the bond measure projects, the cumulative analysis qualitatively assess "the impacts of these Ocean Campus projects identified in Table 3.A-2 collectively as the 'City College Facilities Master Plan' using best available information at the time of this SEIR preparation."

The draft SEIR appropriately considers the facilities master plan projects in its cumulative analysis. At the time the Notice of Preparation was published in October 2018, the facilities master plan had not been adopted by the City College Board of Trustees. The draft SEIR acknowledges on p. 3.A-10 that the facilities master plan was adopted in March 2019. As stated on draft SEIR p. 3.A-14 (and as updated in RTC Chapter 5), "[a]t subsequent 2019 Board of Trustees meetings, City College staff presented a facilities planning update on a potential bond measure that would be anticipated to fund construction of the facilities master plan projects...[i]n that update, a number of the facilities master plan projects were included in the list of potential bond-funded improvements. However, the East Basin Parking Garage was no longer included, the Performing Arts and Education Center was replaced by a new Diego Rivera Theater and a smaller STEAM building (both on the east basin), and a Student Development Building was proposed at the location of the existing Creative Arts Extension Building."

The bond measure, which passed on March 3, 2020, listed a range of project types that could be funded by the bond for the City College campus system: "the types of authorized projects of the measure also include...facility master plan preparation and updates, environmental studies...[i]n addition to the projects listed above, repair, renovation and constructions may include, but not be limited to, some or all of the following:...build new or renovate existing facilities such as a Science, Technology, Engineering Art and Math (STEAM) building... fine and theater arts and visual arts and performing arts facilities ..."<sup>3</sup> At the time of this RTC document publication, the City College Board of Trustees are still required to allocate and authorize bond funding towards specific projects, including potentially those identified in the facilities master plan at the Ocean Campus.

**Commented [WW(2)]:** FYI, the bond measure also states the funding could go toward "construct[ing] parking facilities"

**Commented [PJ(3)]:** Check the footnotes. There are only two listed. I assume this one is the meeting minutes.

<sup>1</sup> Balboa Reservoir Community Advisory Committee City & County of San Francisco, Item 4-Updates from City College (audio), [https://media.sfplanning.org/audio/cac/balboareservoir\\_CAC\\_Audio-061019-04.mp3](https://media.sfplanning.org/audio/cac/balboareservoir_CAC_Audio-061019-04.mp3), accessed January 7, 2020.

<sup>2</sup> Balboa Reservoir Community Advisory Committee City & County of San Francisco, Meeting Minutes, June 10, 2019, [https://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir\\_CAC\\_Unapproved\\_Meeting\\_Minutes-06102019\\_revised.pdf](https://default.sfplanning.org/plans-and-programs/planning-for-the-city/public-sites/balboareservoir_CAC_Unapproved_Meeting_Minutes-06102019_revised.pdf), accessed January 7, 2020.

As noted on draft SEIR p. 3.A-14, the projects identified in the facilities master plan are still required to undergo a separate CEQA review process. The cumulative analysis in the draft SEIR is conservative in that it identifies potential facilities master plan projects or bond measure projects, where appropriate. The ~~project description draft SEIR detail for the facilities master plan projects could change, these projects have not undergone environmental review, and because~~ acknowledges that there is no quantifiable data available from City College related to the facilities master plan projects; therefore, the analysis is based on conservative assumptions regarding what is reasonably foreseeable, and the analysis does not engage in speculation. CEQA Guidelines section 15130(b) states that the discussion of cumulative impacts “need not provide as great detail as is provided for the effects attributable to the project along. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.”

Commented [WW(4)]: Please confirm edit

The cumulative transportation-related construction impacts are discussed under Impact C-TR-1 on draft SEIR p. 3.B-91 and states that “construction of the proposed project or variant may overlap with construction of other cumulative development and transportation infrastructure projects, including new development and/or modernization of existing buildings as part of the City College Facilities Master Plan ... although the City College facilities master plan projects would not be required to comply with all of the city’s requirements, they would be required to adhere to the blue book regulations addressing transportation-related circulation, access, staging and hours of delivery when working on city streets.”

Cumulative transportation-related operational impacts are discussed under Impacts C-TR-4 to C-TR-6b on draft SEIR pp. 3.B-92 to 3.B-102. The analysis under each cumulative transportation-related operational impact qualitatively assesses the potential impacts of the facilities master plan projects. As stated on draft SEIR p. 3.B-95, “the transit delay contribution from City College’s Ocean Campus, in combination with the proposed project options, is unknown. For the purposes of a more conservative analysis, the addition of vehicle and transit trips generated by the proposed project options in combination with the City College facilities master plan projects and other cumulative developments is expected to increase transit delay and could exceed the four-minute threshold of significance for individual Muni routes described in the Approach to Impact Analysis Methodology.” The analysis concludes that cumulative transit delay would be significant even with the implementation of Mitigation Measure M-C-TR-4.

The cumulative air quality-related construction impacts are discussed under Impact C-AQ-2 on draft SEIR p. 3.D-92. As stated on draft SEIR p. 3.D-92, the cumulative projects “could include the City College Performing Arts Center... and is anticipated to be under construction for 24 months from 2021 to 2023.” The cumulative air quality analysis states that new sensitive receptors “could potentially be exposed to the project’s construction and operational toxic air contaminant emissions if the new receptors are present in the near future.” The project-level health risk assessment identified sensitive receptors that are close to where the new City College facilities master plan projects might be located, and acknowledges that possibility that these projects could generate construction-related toxic air contaminant emissions at the same time as the proposed project. The analysis concludes that the proposed project in combination with nearby cumulative projects



would result in significant health risk impact on offsite and onsite sensitive receptors with respect to increased cancer risk, even with the implementation of Mitigation Measures M-AQ-2a, M-AQ-4a, and M-AQ-4b.

The draft SEIR noise section qualitatively assesses the impacts of the facilities master plan projects including the potential Performing Arts and Education Center building on the east basin under Impact C-NO-1 on draft SEIR pp. 3.C-38 to 3.C-39. As stated on draft SEIR p. 3.C-39, "with respect to existing offsite receptors, the closest cumulative project where concurrent construction would have the potential to cumulatively increase noise levels at existing sensitive receptors would be the City College East Basin Parking Structure, although the Performing Arts Center is also in the same campus area, which is located approximately 80 feet south of Archbishop Riordan High School." The cumulative noise analysis is conservative in which it considers the worst-case scenario (i.e., the East Basin Parking Structure being the closest facilities master plan project) would be constructed near Archbishop Riordan High School (sensitive receptor). The analysis concludes that the proposed project in combination with nearby cumulative projects would result in significant construction-related noise impacts on sensitive receptors, even with the implementation of Mitigation Measure M-NO-1.

As described above, where the draft SEIR determines cumulative impacts to be significant, mitigation measures to reduce those cumulative impacts to the extent feasible are identified. Therefore, the cumulative analysis appropriately considers the growth and development information available for the City College Ocean Campus at the time of the draft SEIR preparation.

**Commented [PJ(5)]:** ESA: you left some blank comments here, but I think you meant to respond to my previous comment about where to discuss changes to cumulative assumptions since the East Basin Parking Structure wasn't in the bond measure. This was addressed above, and it's fine that this text hasn't changed from RTC-2.